

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20290-CR-BLOOM(s)

UNITED STATES OF AMERICA,

v.

ERIC DEAN SHEPPARD,

Defendant.

**GOVERNMENT'S SIXTH RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this sixth response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

A. 5. The following documents are being produced:

Certified copies of IRS records previously produced, with one additional tax return for HM Up Development Alafaya Trails;
Records from ACAP SME, which are the loan records previously produced from Northeast Bank, plus email records and log-in record;
Records from Burlington Coat Factory and Dick's Sporting Goods;
Record from SBA re HM Four;
Additional PayPal records;
Record of no record from Truist Bank;
DAVID record;
Google, Yahoo and Breezelne records were previously produced.

B. DEMAND FOR RECIPROCAL DISCOVERY: Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government reiterates its request for reciprocal discovery of materials the defense intends to introduce at trial in its case in chief.

N. The government has disclosed information about its expert witness and has produced the witness's curriculum vitae to the defense.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

The government is producing (or has produced) the above-referenced documents bates numbered as SHEPP_031325 through SHEPP_032454, electronically via the USAFX portal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 1, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF (without attachments), which will send Notices of Electronic Filing to all counsel of record.

s/Aimee Jimenez
Aimee C. Jimenez
Assistant United States Attorney